

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION AT DAYTON**

ELWOOD JONES, JR.

\*

Petitioner,

\* CASE NO. 1:01-cv-00564

v.

\* JUDGE THOMAS ROSE

MARGARET BAGLEY, WARDEN

\* MAGISTRATE JUDGE MERZ

Respondent.

\*

---

**RESPONDENT'S MOTION FOR WITHDRAWAL AS COUNSEL**

---

Now comes Heather L. Gosselin, Principal Assistant Attorney General for Respondent, and hereby notifies the court she is no longer with the Capital Crimes Unit of the Attorney General's Office and requests withdrawal as counsel of record for Respondent in the above styled appeal.

Respectfully submitted,

**MARC DANN**  
Ohio Attorney General

s/Heather L. Gosselin  
**HEATHER L. GOSSELIN (0072467)**  
Principal Assistant Attorney General  
Capital Crimes  
30 East Broad Street, 23<sup>rd</sup> Floor  
Columbus, Ohio 43215-3428  
(614) 728-7055; (614) 728-8600

**COUNSEL FOR WARDEN**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing Respondent's Motion for Withdrawal as Counsel has been forwarded, via this court's electronic filing system to Michael L. Monta, 3625 Old Salem Road, Dayton, Ohio 45415 and Gary W. Crim, 943 Manhattan Avenue, Dayton, Ohio 45406-5141, on this the 19<sup>th</sup> day of June, 2007.

s/Heather L. Gosselin  
**HEATHER L. GOSSELIN (0072467)**  
Principal Assistant Attorney General